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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,
Plaintiff,
v.
UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
Defendants.

Case No. 3:17-cv-00939-WHA

**[PROPOSED] ORDER ON
ATTORNEY-CLIENT
COMMUNICATION PURSUANT TO
RULE 502**

Trial Date: February 5, 2017

WHEREAS, Waymo has indicated that it would like to take the depositions of 6 Morrison & Foerster partners and one Boies Schiller partner;

WHEREAS, Uber objects to such depositions;

WHEREAS, the Special Master has recommended that Waymo provide four written questions to be answered by Morrison & Foerster and Boies Schiller;

WHEREAS, the parties agree that responding to those four questions will not constitute a waiver of the attorney-client privilege, work product or any other applicable privilege or protection in any way for this or any other litigation, arbitration, or investigation;

WHEREAS, the parties have also agreed that they will not argue that the “sword/shield” doctrine requires further disclosure of privileged information due to the limited disclosure agreed-upon herein;

IT IS HEREBY ORDERED, pursuant to Rule 502 of the Federal Rules of Evidence, that the disclosure described herein will not operate as a waiver of any applicable privileges or protections in this litigation or any other federal or state proceeding.

IT IS SO STIPULATED.

Dated: December 11, 2017

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Jacqueline Scott Corley
HONORABLE JACQUELINE SCOTT CORLEY
United States Magistrate Judge